



February 29, 2008  
Via ECFS Transmission

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Ms. Marlene H. Dortch, FCC Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

RE: **Arizona Dialtone, Inc. - 2007 CPNI Certification Filing**  
**EB Docket No. 06-36**

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice of January 29, 2008, enclosed for filing please is the 2007 Annual CPNI Compliance Certification submitted on behalf of Arizona Dialtone, Inc., as required by section 64.2009(e) of the Commission's rules.

Any questions you may have concerning this filing may be directed to me at 470-740-3004 or via email to [morton@tminc.com](mailto:morton@tminc.com).

Sincerely,

Robin Norton  
Consultant to Arizona Dialtone, Inc.

RN/ks

cc: Best Copy and Printing - [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM)  
FCC Enforcement Bureau (provided via ECFS website)  
Tom Bade - AZ Dialtone  
file: AZ Dialtone - FCC  
tms: FCCx0801



**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for Calendar Year:     **2007**

Name of company covered by this certification:                 **Arizona Dialtone, Inc.**

Form 499 Filer ID:   **821472**

Name of signatory:   **Thomas Bade**

Title of signatory:    **President**

I, **Thomas Bade**, certify and state that:

1.     I am the **President** of **Arizona Dialtone, Inc.** and, acting as an agent of the company, I have personal knowledge of **Arizona Dialtone, Inc.'s** operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2.     I hereby certify that, to the best of my knowledge, information and belief, **Arizona Dialtone, Inc.'s** operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3.     Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.



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Thomas Bade, President  
Arizona Dialtone, Inc.

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Date 2/29/08



**Statement of CPNI Procedures and Compliance  
For 2007  
Arizona Dialtone, Inc.**

Arizona Dialtone, Inc. is a very small CLEC operating in three states, providing basic local service as well as payphone access lines to payphone owners. We do not currently offer long distance service.

We do not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Arizona Dialtone, Inc. has trained its personnel not to use CPNI for marketing purposes. Should Arizona Dialtone, Inc. elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

We have put into place processes to safeguard our customers' CPNI and call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. No CPNI is disclosed to any outsiders except by Subpoena from a court. Only five employees have access to this information; these employees have been trained by the president of the company not to divulge CPNI under any circumstances.

We do not disclose CPNI over the telephone. No information is disclosed over the phone by any employee. Call data is mailed to the customer of record only upon verified end user request only. When a customer calls to initiate new service, they provide Arizona Dialtone with a personal pass code. This pass code can be made up of random letters or numbers, and do not contain readily available biographical or account information. When customers calls into our office with inquiries concerning their accounts they are asked to provide us with their personal pass code. If the customer cannot provide this pass code, no information is provided over the phone. They must then send us a request in writing along with a copy of a form of ID and they can request to change the pass code and receive what information they were looking for. All consumer inquiries are verified and recorded.

We do not provide on-line access to CPNI or any customer account information. If we elect to do so in the future, we will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information.



Customers are notified of a change to any account information by US Mail only to the address of record.

We do not have any retail locations and therefore do not disclose CPNI in-store.

We have procedures in place to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

We have not experienced any breaches of CPNI to date, but will maintain records, either written or electronic, of any and all breaches discovered and notifications made to the USSS and the FBI, and to customers.

We have not taken any actions against data brokers in the last year.

We did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2007.

We do not have any information with respect to the processes Pretexters are using to attempt to access CPNI.